

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

JAMES HULCE on behalf of himself and :
others similarly situated :

Plaintiff, :

Case No. 20-cv-775

v. :

LUSTRE-CAL CORPORATION :

Defendant. :

**DECLARATION OF ANTHONY PARONICH IN SUPPORT OF
CIVIL L. R. 7(H) EXPEDITED NON-DISPOSITIVE MOTION
FOR LEAVE TO ISSUE SUBPOENA TO ENSURE THAT DOCUMENTS
IDENTIFYING PUTATIVE CLASS MEMBERS ARE NOT DESTROYED**

I, Anthony Paronich, declare under the penalty of perjury, as provided for by the laws of the United States at 28 U.S.C. § 1746:

1. I am counsel for the Plaintiff in this matter.
2. On June 4, 2021, I sent a preservation letter to jBlast. The letter requested a written confirmation of receipt and steps taken to preserve information by June 11, 2021. No response was received. Furthermore, I understand that the defendant has also sent a preservation letter to jBlast and no response was received.
3. A copy of the letter sent to jBlast is attached.

Executed on July 6th, 2021.



Anthony Paronich

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June 4, 2021

June 4, 2021

VIA FIRST CLASS MAIL AND ELECTRONIC MAIL

jBlast
1013 Centre Road, Suite 403S
Wilmington, DE 19805
info@jBlast.com

Re: *Hulce v. Lustre-Cal Corporation*, United States District Court for the Eastern District of
Wisconsin, Civil Action No. 20-cv-775
STATEMENT OF PRESERVATION OBLIGATIONS

Dear Sir/Madam:

The undersigned represents the plaintiff in a putative class action lawsuit in the matter. The defendant, Lustre-Cal Corporation, has identified your company as the sole company used to send faxes to the putative class of individuals.

We have requested, but not yet received, the account information from Lustre-Cal Corporation for their relationship with jBlast. However, the following Caller ID number was used to send at least one such fax in May of 2020: 628-242-2812.

With this letter, we hereby notify you that the law requires you to take all reasonable steps necessary to preserve all documents, tangible things, and electronically stored information (“ESI”) that are potentially relevant to the subject matter of this action, which includes images of any faxes sent by Lustre-Cal Corporation as well as all transmission logs of faxes sent by Lustre-Cal Corporation from **May 22, 2016** forward.

The list is not comprehensive and does not in any way limit your obligations to preserve information, including ESI. Your company’s obligation to preserve this information extends to all agents, vendors, or contractors who have possession of documents or electronically stored information potentially responsive in this litigation.

jBlast

Re: *Hulce v. Lustre-Cal Corporation*, United States District Court for the Eastern District of Wisconsin, Civil Action No. 20-cv-775

STATEMENT OF PRESERVATION OBLIGATIONS

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We trust that you are fully aware of your obligations and have taken the necessary steps to preserve information. Please confirm to us in writing by **June 11, 2021** that the relevant documents have been preserved and identify with specificity what was preserved as well as any prior preservation notices you have received regarding this litigation.

Regards,

/s/ Anthony Paronich

Anthony Paronich